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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
STOCKTON, a California corporation
sole,

Debtor-In-Possession.

CASE NO. 14-20371-C-11

**NOTICE OF DEADLINE FOR FILING CLAIMS
RELATING TO OR ARISING FROM SEXUAL ABUSE**

**THIS IS AN IMPORTANT NOTICE;
YOUR RIGHTS MAY BE AFFECTED**

**AUGUST 15, 2014, AT 4:00 P.M. (PREVAILING PACIFIC TIME)
IS THE LAST DATE TO FILE PROOFS OF CLAIM FOR SEXUAL ABUSE**

**TO ALL PERSONS WITH KNOWN OR POTENTIAL CLAIMS ARISING FROM
SEXUAL ABUSE FOR WHICH THE ROMAN CATHOLIC BISHOP OF STOCKTON, a
California corporation sole (aka THE DIOCESE OF STOCKTON) MAY BE LIABLE:**

PLEASE TAKE NOTICE that on January 15, 2014 (the “Petition Date”), The Roman Catholic Bishop of Stockton (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). You should carefully read this notice if you believe that you have a claim arising from Sexual Abuse (defined below) for which you believe the Debtor may be liable.

For purposes of this Notice:

1. “Sexual Abuse” means: sexual conduct/touching or misconduct, sexual abuse, sexual misconduct or molestation, indecent assault and/or battery, rape, lascivious behavior, undue familiarity, pedophilia, ephebophilia, or sexually related psychological or emotional harm or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult. “Sexually Abused” has a correlative meaning. A child or non-consenting adult may be Sexually Abused whether or not this activity involves explicit force, whether or not this activity involves genital or other physical contact and whether or not there is physical, psychological or emotional harm to the child or non-consenting adult.
2. A “Sexual Abuse Claim” is a claim for any or all acts or omissions for which the Debtor may be legally responsible that in any way arise out of, are based upon, or involve Sexual Abuse.
3. A “Sexual Abuse Claimant” is a person who asserts a Sexual Abuse Claim.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

A list of claimed abusers is attached to this notice. This list is not exhaustive. Possible abusers might include clergy members, employees, deacons, teachers, coaches, volunteers, or other personnel. The fact that this list does not include the name of the person who Sexually Abused you does not mean that you should not file your Sexual Abuse Claim (using the “Sexual Abuse Proof of Claim Form,” as described below).

For more information, please visit: [Par mas informacion, por favor visite:] [Xav paub ntau ntiv, thov mus saib:]

- www.stocktondiocese.org
- www.kccllc.net/stocktondiocese
- www.pszjlaw.com/stocktondiocese.html (the “Committee Website”)

1 The Committee Website is maintained by counsel to the Official Committee of Unsecured
2 Creditors (the "Committee") and at that site are, among other things: (i) a Sexual Abuse Proof of
3 Claim Form; (ii) a list of names, dates, locations, and years of service of known abusers; (iii) if
4 available, pictures, of known abusers; (iv) copies of the Bar Date Order, and the Sexual Abuse
Claim Bar Date Notice; (v) a list of Schools and Parishes in the area served by the Debtor from
1962 to 2014; and (vi) a list of Catholic-affiliated organizations located within the Debtor's
geographic boundaries (the "Catholic Entities").

5 You also may obtain information regarding the Debtor's bankruptcy case or copies of the
6 items listed above from: (A) counsel to the Official Committee of Unsecured Creditors
(Pachulski Stang Ziehl & Jones LLP) by calling **toll free (888) 570-6217**; or (B) counsel to the
7 Debtor (Paul Pascuzzi at Felderstein Fitzgerald Willoughby & Pascuzzi LLP) by calling **(916)
329-7400** or visiting www.ffwplaw.com.

8 **You may wish to consult an attorney regarding this matter.**

9 **FILING DEADLINE**

10 The United States Bankruptcy Court for the Eastern District of California (the "Court")
has entered an order (the "Bar Date Order") establishing **August 15, 2014 at 4:00 p.m.
(prevailing Pacific Time)** (the "Sexual Abuse Claim Bar Date") as the last date and time for each
11 Sexual Abuse Claimant to assert a Sexual Abuse Claim. A copy of the proof of claim form that
has been specifically tailored for claims of Sexual Abuse Claimants (the "Sexual Abuse Proof of
12 Claim Form") is included with this Notice. The Sexual Abuse Claim Bar Date and the procedures
set forth below apply to all Sexual Abuse Claims against the Debtor based upon Sexual Abuse
13 that occurred before January 15, 2014. A different deadline applies to parties who may assert
claims that are not Sexual Abuse Claims against the Debtor. Consult the Bar Date Order for all
14 applicable deadlines to file claims against the Debtor or in this chapter 11 case.

15 **WHO MUST FILE**

16 If you believe that you have a Sexual Abuse Claim (which you may have even if you have
17 never previously reported your Sexual Abuse or filed a lawsuit against the Debtor), **you must file
a Sexual Abuse Proof of Claim Form** to maintain and/or preserve any claims that you have
18 against the Debtor. **Even if you have already filed a lawsuit against the Debtor alleging
Sexual Abuse prior to January 15, 2014, you must still submit a Sexual Abuse Proof of
19 Claim Form to maintain and/or preserve your rights in the Debtor's chapter 11 case.**

20 **WHO SHOULD NOT FILE**

21 You should **not** file a Sexual Abuse Claim if:

- 22 • Your Sexual Abuse Claim has already been paid in full;
- 23 • You do not have a Sexual Abuse Claim against the Debtor; or
- 24 • You do not have a claim against the Debtor.

25 **WHAT TO FILE**

26 **IN ORDER TO ASSERT A SEXUAL ABUSE CLAIM AGAINST THE DEBTOR, YOU
MUST COMPLETE, SIGN AND FILE A SEXUAL ABUSE PROOF OF CLAIM FORM.
YOU MAY OBTAIN A COPY OF THE SEXUAL ABUSE PROOF OF CLAIM FORM BY
27 FOLLOWING THE INSTRUCTIONS BELOW.**

PROCEDURES FOR FILING A SEXUAL ABUSE PROOF OF CLAIM FORM

To submit a Sexual Abuse Proof of Claim Form, you must take the following steps:

- Fill out the Sexual Abuse Proof of Claim Form.
- For additional copies of the Sexual Abuse Proof of Claim Form you may:
 - (a) photocopy the Sexual Abuse Proof of Claim Form;
 - (b) go to the website established by the Committee's counsel at www.pszjlaw.com/stocktondiocese.html;
 - (c) contact the Debtor's Claims Agent between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Pacific time), Monday through Friday, at (310) 751-1492, or visit the Claims Agent's website at: www.kccllc.net/stocktondiocese; or
 - (d) go to the web page established by the Debtor at www.stocktondiocese.org.
- Please note that the Debtor's counsel, the Debtor's staff, the Claims Agent's staff and the Committee's counsel are not permitted to give you legal advice about your claim. You should consult your own attorney for assistance regarding any other inquiries, such as questions about completing or submitting a Sexual Abuse Proof of Claim Form.
- Return the completed Sexual Abuse Proof of Claim Form plus two copies to the Court at the address set forth below no later than **August 15, 2014 at 4:00 p.m. (prevailing Pacific Time)**. Sexual Abuse Proof of Claim Forms will be deemed timely submitted only when they are **actually received** by the Court no later than **August 15, 2014 at 4:00 p.m. (prevailing Pacific Time)**.
- Please note that Sexual Abuse Proof of Claim Forms submitted by facsimile, telecopy or electronic mail transmission will not be accepted and will not be deemed filed. If you are returning a Sexual Abuse Proof of Claim Form by mail, allow sufficient mailing time so that the Sexual Abuse Proof of Claim Form is received by the Court on or before August 15, 2014 at 4:00 p.m. (prevailing Pacific Time). Sexual Abuse Proof of Claim Forms that are postmarked before that date (*i.e.*, the Sexual Abuse Claim Bar Date) but which are received by the Court after the Sexual Abuse Claim Bar Date will be considered late.
- If a Sexual Abuse Claimant returns a Sexual Abuse Proof of Claim Form in person, by mail, overnight delivery, or by courier service, the Sexual Abuse Proof of Claim Form should be delivered to the following address, between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Pacific Time), Monday through Friday:

U.S. Bankruptcy Court
Attn: Diocese of Stockton Confidential Claim
501 I Street, Suite 3-200
Sacramento, CA 95814

- If you are returning a Sexual Abuse Proof of Claim Form by mail, allow sufficient mailing time so that the Sexual Abuse Proof of Claim Form is received on or before **August 15, 2014 at 4:00p.m. (prevailing Pacific Time)**. If you wish to receive acknowledgement of the Court's receipt of your proof of claim, then, by the Sexual Abuse Claim Bar Date, and at the same time that you submit your original proof of claim, you also must submit to the Court both: (i) a third copy of the original proof of claim; and (ii) a self-addressed, stamped return envelope.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

The deadline for filing a Sexual Abuse Proof of Claim Form is **August 15, 2014 at 4:00 p.m. (prevailing Pacific Time)**. Any person who has a Sexual Abuse Claim and does not file a Sexual Abuse Proof of Claim by that date may not be treated as a creditor for voting or distribution purposes under any plan of reorganization and such claims may be subject to discharge. Failure to file a Sexual Abuse Claim may prevent such person from voting on any plan of reorganization in this case. Further, if such Sexual Abuse Claim is discharged, the Sexual Abuse Claimant will be forever barred and prevented from asserting his or her Sexual Abuse Claim against the Debtor or its property, and may not receive any payment or distribution in connection with such Sexual Abuse Claim.

CONFIDENTIALITY

Pursuant to the Bar Date Order, Sexual Abuse Proofs of Claim will remain confidential in this case, unless you elect otherwise in Part 1 of the Sexual Abuse Proof of Claim Form. Therefore, the Sexual Abuse Proof of Claim Form that you file will not be available to the general public, but will be kept confidential, except that copies of Sexual Abuse Proof of Claim Forms will be provided, pursuant to Court-approved guidelines, to the Debtor, the Debtor's counsel, the Committee's counsel, and upon request, to the United States Trustee, the following parties and any additional parties the Committee approves, but only after each of such parties agrees to keep the information provided in the Sexual Abuse Proof of Claim Forms confidential:

- (a) Insurance companies that provided insurance that may cover the claims described in the Sexual Abuse Proof of Claim Forms.
- (b) Any future claims representative appointed by the Court (or under a plan of reorganization).
- (c) Any judicial mediator, or special arbitrator/claims reviewer appointed to review and resolve the claims of Sexual Abuse Claimants.
- (d) Any settlement trustee appointed to administer payments to Sexual Abuse Claimants.
- (e) Members of the Committee and their personal counsel (after the Sexual Abuse Proof of Claim Form has been redacted to hide the Sexual Abuse Claimant's name, address and any other information identified in Part 2(A) of the Sexual Abuse Proof of Claim Form).
- (f) Such other persons as the Court determines should have the information in order to evaluate Sexual Abuse Claims.

Dated: May 9, 2014

FELDERSTEIN FITZGERALD
WILLOUGHBY & PASCUZZI LLP

By: /s/ Paul J. Pascuzzi

STEVEN H. FELDERSTEIN
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Sacramento, CA 95814
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Attorneys for The Roman Catholic
Bishop of Stockton, a corporation sole

Fr. Antonio Camacho

Assignments:

Associate Pastor, St. Anthony's Parish, Hughson: 12/1/81 – 1/11/82
Associate Pastor, St. Stanislaus Parish, Modesto: 1/11/82 – 2/17/84

Br. Didachus Clavell, O.F.M.

Assignments:

St. Mary's High School approx. 1964

Fr. Murty Fahy, O.S.F.S.

Assignments:

Teacher at St. Mary's High School, Stockton: 1970 – 1985
Associate Pastor, St. Anne's Church, Lodi: 8/1/85 – 3/2/01
Deceased: 3/2/01

Fr. Michael Kelly

Assignments:

Associate Pastor, Our Lady of Fatima Parish, Modesto: 9/1/73 – 9/23/79
Associate Pastor, St. Bernard's Parish Tracy: 9/24/79 – 6/14/84
Associate Pastor, Cathedral of the Annunciation, Stockton: 6/15/84 – 6/30/87
Pastor of St. Patrick's Parish, Sonora: 7/1/87 – 3/4/97
Administrator of Presentation Parish, Stockton; 3/5/97 – 6/12/97
Pastor of Presentation Parish, Stockton: 6/12/97 – 1/30/00
On Leave: 1/30/00 – 9/3/00
Administrator pro-tem of St. Andrew's Parish, San Andreas: 9/3/00 – 3/30/01
Pastor of St. Andrew's Parish, San Andreas: 3/30/01 – 8/1/02
Pastor of St. Joachim Parish, Lockeford: 8/1/02 – 10/11/07

Fr. Titian Miani

Assignments:

Administrator of Holy Cross Parish, Linden: 8/15/72 – 1/26/81
Educational Leave: 1/26/81 – 7/14/81
Associate Pastor, St. Patrick's Parish, Angels Camp: 7/15/81 – 12/21/82
Administrator of St. Patrick's Parish, Angels Camp: 12/21/82 – 12/31/82
Pastor of St. Patrick's Parish, Angels Camp: 1/1/83 – 5/1/85
Leave of Absence due to ill health: 5/1/85 – 12/31/85
Associate Pastor, St. Luke's, Stockton: 1/1/86 – 12/31/92
Retired: 1/1/93

Fr. Antonio Munoz Rodriguez

Assignments:

Associate Pastor, St. George's Parish, Stockton: 12/12/77 – 5/19/79
Associate Pastor, St. Anthony's Parish, Hughson: 5/19/79 – 9/18/81

Monsignor Edward Noonan

Assignments:

Pastor of St. Joachim Parish, Newman: 6/23/39 – 1/13/43

Pastor of St. Gertrude Parish, Stockton: 1/13/43 – 10/12/66

Pastor Emeritus in residence at St. Gertrude Church: 1966 – 1969

Deceased: 1/20/70

Fr. Oliver O'Grady

Assignments:

Associate Pastor, St. Anne's Parish, Lodi: 9/1/71 – 5/31/77

Associate Pastor, Sacred Heart Parish, Turlock: 6/1/77 – 6/20/82

Associate Pastor, Presentation Parish, Stockton: 6/21/82 – 12/16/84

Administrator of St. Andrew's Parish, San Andreas; 12/17/84 – 4/18/85

Pastor of St. Andrews Parish, San Andreas: 4/18/85 – 1992

Pastor of St. Anthony's Parish, Hughson: 1992 – 6/23/93

Fr. Oskar Pelaez

Assignments:

Associate Pastor, St. Anthony's Parish, Hughson: 4/8/94 – 8/1/95

Associate Pastor, Sacred Heart Parish, Turlock: 8/1/95 – 9/1/98

Associate Pastor, Our Lady of Fatima Parish, Modesto: 9/1/98 – 1/14/00

One year leave of absence: 1/14/00 – 1/27/01

Associate Pastor, Cathedral of the Annunciation Parish: 1/27/01 – 11/30/01

Fr. Leo Suarez

Assignments:

Associate Pastor, St. Anthony's Church, Hughson: 10/7/88 – 2/1/91

Associate Pastor, St. Stanislaus Parish, Modesto: 2/1/91 – 12/1/92

Associate pastor, St. George's Parish, Stockton: 12/1/92 – 1/31/97

Administrator of St. Edward's Parish, Stockton: 2/1/97 – 8/1/08

Associate Pastor, Sacred Heart Church, Turlock: 8/1/08 – 2/21/09

Associate Pastor, Our Lady of Fatima Church, Modesto: 2/21/09 – 7/22/09

Fr. Fernando Villalobos, O.F.M.

Assignments:

Administrator of St. Mary's Church, Stockton: Oct. 1979 – August 31, 1980

Episcopal Vicar for Hispanics in Diocese of Stockton: 9/1/80 – 12/31/85

Deceased: 12/31/85